

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of))
Implementation of the Subscriber Carrier Selection Changes
Provisions of the Telecommunications Act of 1996))))) CC
Docket No. 94-129
Policies and Rules Concerning Unauthorized Changes of Consumers'
Long Distance Carriers))

COMMENTS OF THE OKLAHOMA CORPORATION COMMISSION
REGARDING THE THIRD ORDER ON RECONSIDERATION AND
SECOND FURTHER NOTICE OF PROPOSED RULEMAKING

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Pursuant to the Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking ("NPRM") released March 17, 2003, in the above-captioned proceeding, the Consumer Services Division of the Oklahoma Corporation Commission ("OCC") respectfully submits comments. The OCC has reviewed each of the amendments to the Federal Communications Commission ("FCC") Rules and Regulations in this order and is of the opinion that the amendments further strengthen the effectiveness of governmental regulation of regulated telecommunications carriers who submit or execute an unauthorized change in a subscriber's selection of a provider of telephone exchange service or telephone toll service ("slamming").

The NPRM seeks comment on whether third party verifiers should state the date during the taped verification process.

The NPRM also seeks comment on whether the verifier should explicitly state that, if the customer has additional questions for the carrier's sales representative regarding the carrier change after verification has begun, the verification will be terminated, and further verification proceedings will not be carried out until after the customer had finished speaking with the sales representative.

The NPRM also seeks comment on whether the verifier should convey to the customer that the carrier change can be effectuated without any further contact with the customer once the verification has been completed in full.

The NPRM also seeks comment on whether verifiers should be required to make clear to a customer that he or she is not verifying an intention to retain existing service, but is in fact asking for a carrier change.

The NPRM also seeks comment on whether, when verifying an interLATA service change, the verifier should specify that interLATA service encompasses both international and state-to-state calls, and whether a verifier should define the terms "intraLATA toll" and "interLATA toll" service.

The State of Oklahoma fully supports any and all efforts by the FCC to totally eliminate slamming by making the practice unprofitable. Eradicating the practice from the telecommunications industry is desired by all who have been subjected to it.